

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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|--------------------------------|---|--------------------------------|
| JODI ROUVIERE and |) | |
| ANDRE ROUVIERE, |) | |
| |) | |
| <i>Plaintiffs,</i> |) | |
| |) | |
| v. |) | Case No. 1:18-cv-04814-LJL-SDA |
| |) | |
| DEPUY ORTHOPAEDICS, INC. n/k/a |) | |
| MEDICAL DEVICE BUSINESS |) | |
| SERVICES, INC. and HOWMEDICA |) | |
| OSTEONICS CORPORATION |) | |
| d/b/a STRYKER ORTHOPAEDICS, |) | |
| |) | |
| <i>Defendants.</i> |) | |

**PLAINTIFFS' NOTICE OF FILING DECLARATION OF
ATTORNEY MATT MORRISON**

Pursuant to this Court's order dated November 5, 2020, (ECF 243), Plaintiffs Jodi Rouviere and Andre Rouviere, by and through undersigned counsel, file the Declaration of Attorney Matt Morrison in the instant case which is attached hereto and redacted, for this Court's review and consideration in the pending Rule 59(e) motion and proceedings, with the Clerk of this Court.

Miami, Florida.

Respectfully submitted,

LAW OFFICES OF ANDRE A. ROUVIERE
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Coral Gables, Florida 33146
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Attorney for Plaintiffs

//ss// Andre Rouviere
ANDRE A. ROUVIERE

Attorney for Plaintiffs.

CERTIFICATE OF SERVICE

I, Andre Rouviere, hereby certify that a true and correct copy of the foregoing was filed electronically on the 5th day of December, 2020 in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to all parties by operation of the Court's Electronic Filing System. Parties may access this filing through the Court's Filing System. The undersigned counsel has also served each counsel via email on this 5th day of December, 2020.

//ss// Andre Rouviere
ANDRE A. ROUVIERE

UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Case No.: 1:18-cv-04814-AJN

JODI ROUVIERE, Individually and
ANDRE ROUVIERE, her husband, individually,

Plaintiff,

v.

DEPUY ORTHOPAEDICS, INC.,
DEPUY PRODUCTS, INC.,
DEPUY INTERNATIONAL, LIMITED,
JOHNSON & JOHNSON, INC.,
and JOHNSON & JOHNSON SERVICES, INC.,
and STRYKER CORPORATION,
STRYKER SALES CORPORATION, and
HOWMEDICA OSTEONICS CORPORATION,
d/b/a STRYKER ORTHOPAEDICS,

Defendants.

DECLARATION OF MATT MORRISON

I, MATT MORRISON, hereby declare and affirm under penalties of perjury that the below statements and claims are true and correct:

1. My name is Matt Morrison and I am a licensed attorney and member in good standing with the Texas Bar. I am an attorney in good standing and admitted to practice law in the Pinnacle Hip Implant Products Liability Litigation 3:11-md-02244-K pending in the United States District Court for the Northern District of Texas. I am a shareholder at the law firm of *Harrison Davis Steakley Morrison Jones, P.C.* The information in this declaration is based upon my own personal knowledge.

2. I represent Bryon D. Rowe and Melanie A. Rowe in the civil product liability case against Johnson and Johnson, Inc., Depuy Orthopaedics, Inc et al. *See* Bryon D. Rowe and Melanie A. Rowe v. Depuy Orthopaedics, Inc et al., No. 3:12-cv-04354-K (N.D. Tex – Dallas Division). The case has been transferred under the MDL Case captioned and numbered *In Re: DePuy Orthopaedics, Inc. Pinnacle Hip Implant Product Liability Litigation*, MDL No. 2244 (N.D. Tex – Dallas Division) (case pending) (hereinafter referred to as “MDL case”).

3. This MDL case as of the date of executing this declaration, is still an open and pending litigation.

4. Specifically, Depuy Orthopaedics, Inc. named and offered up its expert witnesses in this MDL case, one of whom is [REDACTED] a biomechanical engineer.

5. My clients, Bryon D. Rowe and Melanie A. Rowe have not accepted or executed a settlement agreement with DePuy and other named defendants. Rather, this MDL case is still pending.

Further declarant sayeth not.

PURSUANT TO TITLE 28 U.S.C. 1746, I, MATT MORRISON, hereby declare and affirm under penalties of perjury that the foregoing statements and claims are true and correct, done on this 30th day of November 2020.


MATT MORRISON